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ABSTRACT

Cooperative education, said to be a "sleeping giant" in vocational education, received special authorization in Public Law 90 576 and was made a priority in vocational education. This publication summarizes information to assist the states in planning development of cooperative vocational education: definitions, funding sources, program content, and applicable legislation including regulations for State vocational education programs. It is intended to be used in conjunction with "A Guide for Cooperative Vocational Education" prepared by the University of Minnesota under contract with the Office of Education and available as ED 037 564. (MF)

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COOPERATIVE VOCATIONAL EDUCATION PROGRAMS

VT018251

FOREWORD

This publication summarizes selected facts and suggestions which may be helpful to State staffs in planning for the further development of cooperative vocational education. The purpose of this document is to bring together those elements of information which appear to be pertinent in facilitating the decision-making process.

The Resource Manual should be used in concert with A Guide for Cooperative Vocational Education, a publication prepared by the University of Minnesota under contract with the Office of Education. This publication is no longer available from the Office of Education but has been reproduced for sale ($1.50 per copy, plus 50¢ for postage and handling) by the Nicholson Bookstore, University of Minnesota, Minneapolis, Minnesota 55455. The Guide presents concepts and principles for program development whereas the Resource Manual is styled to serve program information needs.

While the Resource Manual includes programmatic discussions, the material contained herein cannot take precedence over the Act, the Regulations, or individual State plans. Authorization for the expenditure of Federal funds granted to a State is given by the State Director of Vocational Education.

This Resource Manual should be viewed as a form of technical assistance. The material was prepared by Edwin L. Nelson, Education Program Specialist, under the direction of Sherrill D. McMillen, Chief, State Programs and Services Branch.

July, 1972

Michael Russo
Acting Director
Division of Vocational and
Technical Education

COOPERATIVE VOCATIONAL EDUCATION PROGRAMS

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Cooperative Vocational Education Programs

INTRODUCTION

Cooperative vocational education is an interdependent combination of vocational instruction and employment related to that instruction. Employment under this arrangement is conceived to be an extension of in-school instruction; that is, a method of instruction which provides relevant laboratory experiences in a real life setting.

A cooperative vocational education program, therefore, is designed to serve an educational or training objective. Students participate in a cooperative program because they wish to acquire qualifications for a pre-determined area of competitive employment. For them it is career preparation.

Cooperative programs are not new, even though special authorization for cooperative vocational education in P.L. 90-576 is new. This plan for utilizing community learning stations has been encouraged and practiced within the framework of specific occupational program areas for many years. This highly effective technique gained prominence and Congressional support when the National Advisory Council on Vocational Education reported:

> "The part-time cooperative plan is undoubtedly the best program we have in vocational education. It consistently yields high placement records, high employment stability, and high job satisfaction."

The Council further observed:

> "Usually, many more students apply than can be accepted; this leads to rejection of the students who need it most."

These findings give direction to program development under the Vocational Education Amendments of 1968: (1) the continuation and expansion of the current effort and (2) the involvement of more disadvantaged youth in cooperative vocational education programs.

It has been said that cooperative education represents a "sleeping giant" in vocational education. The resources and environment for further development are now self-evident. Congress has made cooperative education a priority in vocational education; a new sense of social responsibility exists in the business and industrial community; youth want "relevant" education. In this period of great expectations vocational educators have a unique opportunity to extend the range of vocational education through cooperative vocational education.

Cooperative Vocational Education Programs

DEFINITION

Part G funds are available for cooperative vocational education programs which satisfy the definition in Sec. 175 of P.L. 90-576.

> " . . . . . the term 'cooperative work-study programs' means a program of vocational education for persons who, through a cooperative arrangement between the school and employers, receive instruction, including required academic courses and related vocational instruction by alternation of study in school with a job in any occupational field, but these two experiences must be planned and supervised by the school and employers so that each contributes to the student's education and to his employability. Work periods and school attendance may be on alternate half-days, full-days, weeks, or other periods of time in fulfulling the cooperative work-study program." (Emphasis added)

Interpretation of items underscored:

(a) cooperative arrangement means an agreement between the school and an employer, evidenced by a documented training agreement, to provide instruction and work experiences in accordance with student's training needs.

(b) employer means one who provides on-the-job instruction for a student who is legally employed part-time or full-time, depending upon the scheduled of alternation, and from whom the student receives compensation.

(c) required academic courses means those which are designed for the general student body and are normally required for graduation; such courses are not considered eligible for reimbursement from vocational education funds except as qualified under (d).

(d) related vocational instruction means in-school courses specifically designed to develop and improve occupational skills, knowledges and attitudes, and, to the extent needed, basic education (remedial) and personal social skills; such costs of courses may be reimbursed from vocational education funds. An academic course deemed essential for occupational preparation may be recognized as related vocational instruction if the course is specifically organized to meet the needs of cooperative vocational education students.

(e) alternation of study in school with a job means the scheduling of employment, as part of the student's class load, in any time sequence that will assure adequate preparation in meeting qualifications for full-time employment; school credit is granted for the employment period.

Cooperative Vocational Education Programs

SOURCES FOR FUNDING
Under P.L. 90-576

Part B -- State Vocational Education Programs

Sec. 102 (a) ------- Authorization for State Vocational Education Programs as defined in Part B, Sec. 122 (90%) and Part C -- Research and Training in Vocational Education (10%).

Duration: Permanent

Program Development: Any program, service, or activity funded under Part B may involve cooperative vocational education, including those supported by the set-asides: 15% disadvantaged
10% handicapped
15% postsecondary

Limitation: Subject to the conditions applicable to all programs, services, or activities funded under Part B. Funds may not be used for added employer costs or certain student expenses.

Federal Share: 50% (Statewide Matching)

* * *

Sec. 102 (b) ------- Special authorization for the disadvantaged as defined in Sec. 122 (a) (4) (A).

Duration: 2-year authorization (Extended to FY 75)

Program Development: Cooperative vocational programs may be funded under 102 (b).

Limitation: Subject to the conditions applicable to any Part B program.

Federal Share: Up to 100%.

Sources for Funding (continued)

Part C -- Research and Training in Vocational Education

Sec. 132 ---------- Authorization of grants and contracts for research; research dissemination through training programs; experimental, developmental, and pilot programs to test research findings; demonstration and dissemination projects; development of new curricula; projects in the development of new careers and occupations.

Duration: Permanent

Program Development: A grant or contract for research and training may have as its purpose to facilitate advancements in cooperative vocational education through research activity.

Limitation: Subject to priorities and conditions set for Commissioner's discretionary portion (50%) and by individual State plans (50%).

Federal Share: Up to 90% for grants and contracts.

Part D -- Exemplary Programs and Projects

Sec. 143 ---------- Authorization for (1) planning and developing exemplary programs or projects, and (2) establishing, operating, or evaluating exemplary programs or projects.

Duration: 4-year authorization (Extended to FY 75)

Program Development: Part D provides resources to bring together in one operational setting validated program elements growing out of research and developmental activities. The inclusion of work experience, either primarily for orientation or skill development purposes, or cooperative education as components of Part D projects, is strongly encouraged.

Limitation: Subject to priorities, conditions, and guidelines set forth for 50% of the appropriation for Commissioner's use and for 50% of appropriation for State grant program use.

Federal Share: Up to 100%.

Sources for Funding (continued)

Part E -- Residential Vocational Education (State Programs)

Sec. 152 ---------- Authorization for State planning, constructing, and operating residential vocational education facilities.

Duration: 2-year authorization (Extended to FY 75)

Program Development: Cooperative vocational education may be included as part of the vocational course offerings at such a school.

Limitation: (Appropriations for this Part have not been made)

Federal Share: Up to 90%

Part F -- Consumer and Homemaking Education

Note: Not applicable to cooperative vocational education. Training programs and ancillary services in the area of occupational home economics programs are supported under Part B and may be supported in all other Parts, including Part G.

Part G -- Cooperative Vocational Education Programs

Sec. 172 ---------- Separate authorization for cooperative vocational education programs; definition in Sec. 175.

Duration: 4-year authorization (Extended to FY 75)

Program Development: Any vocational program funded under Part G must include cooperative arrangements, as defined on page 2.

Limitation: Priority for funding is to be given to areas that have high rates of school dropouts and youth unemployment.

Federal Share: Up to 100%

Sources for Funding (continued)

Part H -- Work-Study Programs for Vocational Education Students

Sec. 181 ----------	Authorization for compensation of vocational education students employed by public employers and for administration of program. A program of financial assistance.
Duration:	2-year authorization (Extended to FY 75)
Program Development:	While not required, it is possible for the placement of a "work-study" student to be directly related to his program of studies, thereby satisfying a requirement for enrollment in a cooperative vocational education program.
Limitation:	Subject to conditions in legislation (e.g., maximum compensation) and priorities established by the State Board for funding applications.
Federal Share:	Up to 80%

Part I -- Curriculum Development in Vocational and Technical Education

Sec. 191 ----------	Authorization for curriculum development.
Duration:	2-year authorization (Extended to FY 75)
Program Development:	A grant or contract for the development of curriculum materials may have as its objective the development of materials for use in cooperative vocational education.
Limitation:	The full appropriation will be used at the discretion of the U.S. Commissioner of Education.
Federal Share:	Up to 100%

* * * * *

Note: (1) The two year authorization for 102(b), Part E, Part H, and Part I were extended through FY 1972 under the authority of P.L. 91-230, approved April 13, 1970.

(2) All expiring Parts of P.L. 90-576 (102(b) and Parts D through I) are extended through FY 1975 under the authority of P.L. 92-318, approved June 23, 1972.

Vocational Education Act of 1963, as amended

Comparative Analysis of Cooperative Education Programs
and Work-Study Program

Part B State Vocational Education Programs	Part G Cooperative Vocational Education Programs	Part H Work-Study Programs for Vocational Education Students
1. Money appropriated under Part B and allotted to the States may be expended for cooperative education programs	1. Money appropriated under Part G and allotted to the States shall be expended for developing new programs of cooperative education	1. Money appropriated under Part H and allotted to the States shall be expended for work-study programs
2. Purpose To provide on-the-job work experience related to the student's course of study and chosen occupation	2. Purpose To provide on-the-job work experience related to the student's course of study and chosen occupation	2. Purpose To provide financial assistance to students who are in need of earnings from employment to commence or continue their vocational program
3. Students Served Individuals in all communities of the State who desire and need such education and training	3. Students Served Individuals in all communities of the State who desire and need such education and training Priority is given to areas of high rates of school dropouts and youth unemployment Students in nonprofit private schools to the extent consistent with the number in such schools (proportionate)	3. Students Served Economically disadvantaged full-time vocational education students Priority is given to areas of high rates of school dropouts and youth unemployment

Part B State Vocational Education Programs	Part G Cooperative Vocational Education Programs	Part H Work-Study Programs for Vocational Education Students
4. Uses of Funds Program operation and ancillary services	4. Uses of Funds Program operation and ancillary services Reimbursement of added training cost to employers, when necessary Payment for certain services or unusual costs to students while in cooperative training	4. Uses of Funds Compensation of students employed Development and administration of program
5. Federal Portion of Support Based upon Statewide matching (50/50) for all basic grant vocational education programs as conditioned by the application of State criteria for allocation of funds	5. Federal Portion of Support All or part (100%)	5. Federal Portion of Support 80%
6. Instruction In-school vocational instruction related to occupational field and training job	6. Instruction In-school vocational instruction related to occupational field and training job	6. Instruction In-school vocational instruction not necessarily related to the job
7. Work Periods Alternate half days, full days, weeks, or other periods of time. (Number of hours of work generally equal the number of hours spent in school)	7. Work Periods Alternate half days, full days, weeks, or other periods of time. (Number of hours of work need not equal the number of hours spent in school)	7. Work Periods Maximum of 15 hours per week while attending school; if the student is not attending classes during the summer, there is no limitation upon hours of employment.

Part B State Vocational Education Programs	Part G Cooperative Vocational Education Programs	Part H Work-Study Programs for Vocational Education Students
8. Wage Payments Wages paid by employer Usually at least minimum wage or student-learner rate established by Department of Labor	8. Wage Payments Wages paid by employer Usually at least minimum wage or student-learner rate established by Department of Labor	8. Wage Payments Public funds are used for compensation $45 per month, $350 per academic year or in certain cases $60 per month, $500 per academic year; if the student is not attending classes during the summer, there is no limitation upon the amount of compensation
9. Age Limitations Minimum age 14 as per Child Labor Laws	9. Age Limitations Minimum age 14 as per Child Labor Laws	9. Age Limitations 15 through 20 years of age
10. Eligible Employers Public or private	10. Eligible Employers Public or private	10. Eligible Employers Limited to public, non-profit, employers
11. Administration Administered by the State or local educational agencies under supervision of the State Board for Vocational Education in accordance with State Plan provisions	11. Administration Administered by the State or local educational agencies under supervision of the State Board for Vocational Education in accordance with State Plan provisions	11. Administration Administered by the State or local educational agencies under supervision of the State Board for Vocational Education in accordance with State Plan provisions
12. Program Duration Permanent	12. Program Duration 4 years (Extended to FY 75)	12. Program Duration 2 years (Extended to FY 75)

Cooperative Vocational Education Programs

REGULATIONS FOR STATE VOCATIONAL EDUCATION PROGRAMS*
PART G ONLY

§102.96 State plan provisions - general

"In order to prepare young people for employment through (a) providing meaningful work experience combined with formal education enabling students to acquire knowledge, skills, and appropriate attitudes, (b) removing the artificial barriers which separate work and education, and (c) involving educators with employers, creating interaction whereby the needs and problems of both are made known, thereby making it possible for occupational curricula to be revised to reflect current needs in various occupations, funds allotted to the States for the purpose of part G of the Act may be used for the expansion of cooperative vocational education programs, and for ancillary services and activities which are necessary to assure quality in such programs. The State plan requirements set forth in §§102.31 through 102.46 are also applicable to cooperative vocational education programs assisted under part G of the Act. In addition, the State board shall include provisions in its State plan for the establishment of cooperative vocational education programs through local educational agencies, with participation of public and private employers, as required by §§102.97 through 102.104."

Discussion: This regulation provides the rationale for cooperative vocational education, sets for the guiding principles for expenditures, and identifies program implementation through local educational agencies. It also suggests continuation of existing cooperative programs under the basic grants (Part B) since Part G funds are to be used for "expansion of cooperative . . ." This regulation designates other general regulations which are applicable to Part G programs. These regulations are summarized as follows:

§102.32 State board--Requires a State Board to be the sole State agency responsible for the administration of vocational education, or for the supervision of the administration thereof by local educational agencies.

§102.33 Long-range program plan--Specifies requirements.

§102.34 Annual program plan--Specifies requirements.

*Federal Register, Vol. 35, No. 91--May 9, 1970.

Part G Regulations (continued)

§102.35 State administration and leadership--Requires the State to provide for a staff to carry out State plan provisions, including leadership for cooperative vocational education.

§102.36 Program evaluation--Describes provisions for evaluation of program, services, and activities.

§102.37 Custody of Federal funds--Identifies official to receive Federal funds.

§102.38 Qualifications of personnel--Specifies the designation of minimum qualifications, provision for improvement of qualifications and modification of standards.

§102.39 State reports--Provides for submission of reports.

§102.40 Cooperative arrangements--Requires provisions for arrangements with public employment service system, State agencies responsible for education of handicapped persons, and optional agreements with other agencies, organizations, institutions and States.

§102.41 Effective use of program results and experiences--Requires the use of results and experience of programs assisted under Parts C through I.

§102.42 State fiscal and accounting procedures--Requires description of fiscal control and fund accounting procedures.

§102.43 Opportunity for hearing on local applications--Requires procedures for hearings before the State board.

§102.44 Requirements with respect to construction--Requires compliance with requirements for construction projects assisted under Part B of the Act. (Part G funds may not be used for construction)

§102.45 Economically depressed or high unemployment areas--Designates procedures for designating depressed areas.

§102.46 Areas of high concentration of unemployed youth or school dropouts--Identifies criteria for determing such areas, particularly applicable to Part G.

Part G Regulations (continued)

§102.97 Approval of cooperative vocational education programs

"The State plan shall describe the policies and procedures to be followed by the State board in receiving, reviewing, and approving applications for the development and operation of cooperative vocational education programs submitted by local educational agencies which meet the requirements of §102.98. Such description shall--

(a) Set forth the principles for determining the priority to be accorded applications from local educational agencies for cooperative vocational education programs, with preference being given to applications submitted by local educational agencies serving areas of high concentrations of youth unemployment or school dropouts, as determined pursuant to §102.46; and

(b) Provide, insofar as financial resources are available, for the undertaking of programs in the order determined by the application of such principles."

Discussion: This regulation requires a State to set forth in its State plan application procedures including the designation of content for application forms, criteria for review, and procedures for acting on applications. The State may elect to apply criteria established for Part B vocational education programs as well as other criteria established for Part G programs but must apply the criteria set forth in this regulation: preference given to areas of high incidence of school dropouts and youth unemployment, and funding Part G programs in the order determined by such designation.

While it is the intent of Part G to serve more disadvantaged youth, the language of the law and regulations refers to areas rather than individuals. The correlation between disadvantaged youth and high rates of dropouts and youth unemployment is usually high. Therefore, the likelihood of Part G programs serving disadvantaged youth in target areas is also high. However, any student living in such an area, whether personally disadvantaged or not, could be enrolled in a Part G program.

A percent of Part G funds that must be spent in target areas is not specified in the Act or regulations; therefore, once a State has given priority to applications from such areas, it is permissible to fund programs in other areas. This gives the State an opportunity to impact upon a variety of needs, including those of the disadvantaged, in non-target areas.

Part G Regulations (continued)

§102.98 Requirements of cooperative vocational education programs

"The State plan shall provide that the State board will approve a cooperative vocational education program only if it meets the following requirements:

(a) Purpose. The program meets the definition of a cooperative vocational education program in §102.3(g), and will be administered by the local educational agency with the participation of public or private employers providing on-the-job training opportunities that would not otherwise be available.

(b) On-the-job training standards. The program provides on-the-job training that (1) is related to existing career opportunities susceptible of promotion and advancement, (2) does not displace other workers who perform such work, (3) employs and compensates student-learners in conformity with Federal, State, and local laws and regulations and in a manner not resulting in exploitation of the student-learner for private gain; and (4) is conducted in accordance with written training agreements between local educational agencies and employers, copies of which shall be submitted to the State for filing with the local application.

(c) Other requirements. The program will be carried out in a manner consistent with the provisions set forth in the State plan pursuant to §§102.99 through 102.104."

Discussion: This regulation limits the funding of Part G programs to those which satisfy the definition of "cooperative vocational education program" in the Act and regulations. It also clarifies two conditions which must exist for Part G programs--students are paid and written training agreements are required.

§102.99 Identification of jobs

"The State plan shall provide that cooperative vocational education programs will be approved only if the State board determines on the basis of information in local applications, that necessary procedures have been established for cooperation with employment agencies, labor groups, employers, and other community agencies in identifying suitable jobs for persons who enroll in cooperative vocational education programs."

Discussion: This regulation reinforces the necessary involvement of employers and those who are knowledgeable about job training opportunities and labor market needs in identifying jobs for student-learners. Examples of procedures to be followed might include, but are not limited to, consulting with public employment service personnel, organizing and working with advisory committees, surveying employers, organizing instructional programs in relation to labor market needs, identifying and working with unions and professional groups associated with the occupational fields for which education and training are to be provided, being knowledgeable about other job training programs.

§102.100 Additional costs to employers and students

"(a) Additional costs to employers. The State plan shall set forth the policies and procedures which the State board will require local educational agencies with approval cooperative vocational education programs to follow in determining the added costs to employers for on-the-job training of students, and shall identify the categories of eligible costs for reimbursement to employers. Such policies and procedures shall be designed to assure--

(1) That the payment of added employer costs will be made only when it is apparent that, without such reimbursement, the employer will not be able to provide quality on-the-job training;

(2) That such added employer costs will include only that part of the compensation of students which represents the difference between the compensation to be paid and the fair dollar value of services rendered by the students, as determined by negotiation between local educational agencies and employers;

(3) That such added employer costs will not include the cost of construction of facilities, purchase of equipment, and other capital costs which would inure to the benefit of employers; and

(4) That such added employer costs shall be set forth in training agreements required by §102.98 (b)(4), identifying and justifying the costs factors applied, the amount of funds to be paid, and the duration of reimbursement."

Part G Regulations (continued)

Discussion: This regulation allows the States to determine their own categories of eligible employer costs in their State plans; those costs which are excluded, as specified in the regulation, relate to capital expenditures in employer facilities.

The regulation specifies that payments to employers will be made only when necessary; reimbursing employers for added costs, therefore, is not to be implemented as a standard practice. It may be interpreted that the intent of reimbursing employers is to encourage employers, both public and private, to work especially with students lacking employability skills, thereby reinforcing the concept that Part G programs will be readily available to those students who would not otherwise be selected for a cooperative vocational education program.

Added employer costs may be interpreted as a wage differential or the reimbursement of part of the wages paid to students. In identifying employer costs factors, the question of value returned by student for wages paid becomes an individual-case matter to be resolved through negotiation.

Documentation of agreed upon reimbursable costs in training agreements provides evidence for expenditures and serves as an accounting base for arriving at the total cost of operating Part G programs.

"(b) Cost to students. The State plan shall set forth policies and procedures which the State board will require local educational agencies with approved vocational education programs to follow in reimbursing students or paying on behalf of students unusual costs resulting from their participation in a cooperative vocational education program. The State plan shall also identify such costs, and shall specify when and under what circumstances payments for such costs will be made either to the student as reimbursement or directly to a vendor as payment for goods and services. Such policies and procedures will be designed to assure that payments will be made only for those costs which--

(1) Are not usually required of students preparing for the field of employment for which cooperative vocational education is being provided, such as, special tools, equipment and clothing, transportation, and safety and other protective devices; and

(2) Do not have the effect of underwriting personal obligations and expenses which students in similar circumstances are usually expected to assume."

Discussion: This regulation permits the States to identify allowable student costs in their State plans; excludable costs, as specified in the regulation, refer to those personal and school expenses which are not associated with one's participation in a cooperative vocational education program.

The payment of program-related student expenses should be considered only when it is apparent that unresolved obligations or circumstances would clearly prevent a student from participating in a Part G program. Generally such considerations would be given to economically disadvantaged students; in addition, other needs should be considered, such as unique transportation problems for all students enrolled.

This regulation makes no reference to the maximum expenditure per student or the disposition of tangible items having continuing utility after the student has completed the program. The States, therefore, should make their own provisions regarding the degree of support (all or part, set limits) and the conditions under which the student might retain permanent possession of said items.

§102.101 Participation of students in nonprofit private schools

"The State plan shall set forth the policies and procedures to be followed in cooperative vocational education programs approved and funded under part G of the Act which assure that, to the extent consistent with the number of students enrolled in nonprofit private schools in the area to be served whose educational needs are of the type which such a program is designed to meet, provision has been made for the participation of such students in accordance with the requirements of §102.7."

Discussion: This regulation requires the State and local educational agencies to make provision for the participation of students enrolled in nonprofit private schools on a proportionate basis.

Regulation §102.7 covers the participation of such students in programs funded under Part B 102(b) (disadvantaged), Part D (exemplary) and Part G. Regulation §102.7 provides for (a) the extension of vocational services to students with similar needs in nonprofit private schools through such arrangements as dual enrollment, educational media, mobile equipment and professional services, (b) the inclusion in applications submitted of the number of such students to be served and the degree and manner of their participation, (c) public administrative control of services proved by public school personnel on private school premises,

and the utilization of private school personnel outside their regular hours of duty and under public supervision and control, and (d) avoidance of forming classes on public premises according to school enrollment or religious affiliation.

§102.102 Noncommingling of funds

"The State plan shall set forth the policies and procedures to be followed in cooperative vocational education programs approved and funded under part G of the Act which assure that funds from Federal sources will not be commingled with State or local funds so as to lose their identity as such. In developing such policies and procedures, it shall not be necessary to require separate bank accounts for funds from Federal sources, so long as accounting methods will be established which assure that expenditures of such funds can be separately identified from other expenditures."

Discussion: This regulation requires the States to maintain identity of Part G Federal funds in their accounting procedures.

§102.103 Evaluation and follow-up procedures

"The State plan shall set forth the policies and procedures which the State board will require local educational agencies with approved cooperative vocational education programs to follow in providing for continuous supervision and evaluation of on-the-job training programs and for follow-up of students who have participated in such programs."

Discussion: In addition to §102.36, program evaluation, this regulation covers two distinct requirements: supervision, including coordination, and evaluation of on-the-job training phase of the program, and for after-the-fact follow-up of students. This does not necessarily mean that every in-school teacher must "coordinate" the students he teaches but does mean that each funded program must include a schedule of coordination time available to designated personnel. Follow-up studies may be undertaken by program personnel or by other specified personnel, such as counselors.

Part G Regulations (continued)

§102.104 Ancillary services and activities

"In addition to the general provisions in the State plan with regard to State administration and leadership pursuant to §102.35, program evaluation pursuant to §102.36, and teacher training pursuant to §102.38(b), the State plan shall describe its procedures for providing or making arrangements for the provisions of other ancillary services necessary to assure quality in all cooperative vocational education programs, such as preservice and inservice training of teacher coordinators and development of instructional materials."

Discussion: This regulation requires the State to make provisions for the funding of a variety of ancillary services enumerated in the Act. In general these cover State and local supervision, teacher training (preservice and inservice), counseling service, research and demonstration projects, curriculum development, evaluation--all of which are conceived to enhance the delivery of quality cooperative vocational education programs.

Cooperative Vocational Education Programs

ALLOWABLE EXPENDITURES OF FEDERAL AND MATCHING FUNDS

Funds appropriated and allotted to the States may be applied to expenditures which are reasonably attributable to cooperative vocational education programs and ancillary services and activities.

While a number of specific activities may be supported by Federal and State matching funds, a State may elect not to provide reimbursement for certain expenditures. Final determinations of policies governing expenditures are made by the State Board in relation to State laws, State plan provisions, its judgment regarding judicious expenditure of funds, and funds available. In light of these limitations, the following categories represent allowable expenditures under the Act and Regulations for cooperative vocational education under the authority of Part B and Part G:

1. Instruction and Coordination

   (a) Compensation and travel expenses of professional personnel, including teacher aides, involved in any division of work (instruction and coordination) associated with a cooperative program including periods of extended school day, week, or year.

   Note: Reimbursement may be prorated for those whose responsibilities are divided between vocational education and non-reimbursable general education.

   Note: Coordination involves a range of activities. In addition to the prime activity of coordinating instruction in the school and on the job, coordination may also include, but is not limited to, student recruitment and orientation, survey of employers, organization and work with advisory committees, parent consultation, evaluation (follow-up), report writing, sponsorship of youth organization activities.

   (b) Equipment, supplies, teaching aids, textbooks, student materials; office equipment and supplies necessary for the conduct of the cooperative program.

   (c) Rental of space in privately or publicly owned building, if necessary.

   (d) Compensation and travel expenses of members of advisory groups, as provided in approved State plan.

Allowable Expenditures (continued)

2. Supervision

   (a) Compensation and travel expenses of permanent and temporary staff at State and local levels.

   (b) Administrative costs including clerical assistance.

3. Teacher Education

   (a) Compensation and travel expenses of teacher educators including temporary staff such as graduate assistants and guest instructors.

   (b) Classroom equipment, supplies, and teaching aids.

   (c) Administrative costs including clerical assistance.

   (d) Travel expenses for student teachers, if necessary.

4. Other Ancillary Services and Activities

   (a) Compensation and travel expenses of those engaged in research, curriculum development or evaluation related to cooperative vocational education.

   (b) Administrative costs including clerical assistance.

   (c) Production of printed materials.

5. Unusual Student Expenses

   Note: Generally, the payment of unusual expenses incurred by students as a result of their enrollment in a cooperative program represents a unique feature for the expenditure of Part G funds. However, expenditures to support the following are permissible under Part B:

   (a) Transportation between a school and the place where work experience is being provided.

   (b) Transportation between classes in which the students is enrolled.

   (c) Transportation (one round trip per semester or shorter period as determined by duration of program) from the student's home to the place where he will reside while enrolled.

   (d) Daily transportation between a student's place of residence and the school.

Allowable Expenditures (continued)

The following categories of expenditures may not be reimbursed from Federal and State matching vocational education funds:

1. Unusual Student Costs

   (a) Funds may not be used to provide food, lodging, medical and dental services and other services which may be necessary for students enrolled in Part B or Part G cooperative programs but which are not related to the provision of instruction and work experience.

   (b) Funds may not be used to support expenses related to membership in vocational youth organizations.

2. Teacher Education

   (a) Stipends for enrollees (preservice or inservice) derived from Part B or Part G funds may not be included in any approved teacher education budget.

3. Supervision of Work Experience

   (a) Part G funds may not be used for coordination of work experience which is not related to the provision of in-school vocational instruction; nor, may Part G funds be used to supervise work-study students (Part H).

Part G funds only may be applied to the following categories of allowable expenditures:

1. Unusual Student Expenses

   (a) Payment for goods and services which are normally purchased by workers in an occupational field and which are necessary to function in that occupation, such as, uniforms, special tools and equipment, required physical examinations, safety and protective devices.

2. Added Employer Costs

   (a) Funds may be used to reimburse employers for the added costs involved in the provision of training on the job. Employers may not be reimbursed for construction of facilities, purchase of equipment and other capital acquisitions.

   (b) Local educational agencies should not commit Part G resources for employer reimbursement until a mutual agreement has been reached between State and local personnel as to policies, degree of support, and cost factors.

Allowable Expenditures (continued)

(c) Categories of added employer costs may include, but are not limited to:

(1) Additional instructional materials

(2) Additional supervisory services

(3) Additional periods of formal instruction (excluding regular orientation sessions held for all new employees)

(4) Reduction in productive time for employer representatives to attend, for example, sponsor training sessions conducted by the school

(5) Part of student wages when it is determined that the fair dollar value of services rendered by the student is less than the total wages paid, including consideration of other factors, such as the release from productive duties to engage in special projects designed to improve the employability of the students.

Note: Unless an unusual condition prevails, reimbursement to an employer should cease when the student reaches a level of performance commensurate with other beginning workers.

Cooperative Vocational Education Programs

CONTENT OF LOCAL APPLICATIONS

Part B		Part G	
Proposed Part B cooperative programs become a part of the overall local application for vocational education. Approval and level of funding for any of the programs are determined by the application of State criteria: manpower needs, vocational education needs, ability to pay, excess costs, and any other State-determined criteria. The content of the local application will include:		Applications for Part G programs may be submitted separately or as an addendum to the overall local application. First priority for Part G applications will be given to areas of high rates of school dropouts and youth unemployment. Thereupon the State may elect to apply Statewide criteria used for Part B programs. The content of the Part G application will include:	
Ref.		Ref.	
State Plan Guide and Reg. 102.60	Description of proposed programs, services, activities, evaluation;	State Plan Guide	Nature, duration, purpose, and plan of program;
	Justification of funds requested; amounts and sources of other funds;		Value to vocational education;
	Application developed in consultation with educational and training resources available in area served by applicant;		Qualifications to staff;
	Programs, services, activities will make substantial progress toward career preparation;		Financial arrangements;
	Five-year plan for meeting needs of students in area served by agency; relate to comprehensive area manpower plan, if any;		Participation of public and private employers.
	Means by which proposed programs, services, activities will make progress toward meeting the vocational needs;	Reg. 102.99	Procedures for cooperation with employment agencies, labor groups, employers, and other community agencies in identifying suitable jobs.
	Other information as State may require.	Reg. 102.7 (b)	Number of students enrolled in private nonprofit schools who are expected to participate in the program and the degree and manner of their participation.
		Reg. 102.7 (c)	Assurance that public control and direction of the vocational education services provided on non-public school premises will be maintained.
		Reg. 102.98	Submission of written training agreements with local application (form used).

Cooperative Vocational Education Programs

SUGGESTED CONTENT OF TRAINING AGREEMENT
BETWEEN LOCAL EDUCATIONAL AGENCY AND EMPLOYER

General

1. Name of student and pertinent information, such as age
2. Name of employer and pertinent information, such as nature of enterprise or agency
3. Title and description of job objective for which student is to receive training
4. Length of training period
5. Brief statement of mutual understanding

Compensation

1. Hourly rate to be paid initially
2. Provision for review of wages
3. Prevailing rate for competent full-time employees performing similar job duties
4. Provision for student-learner certificate, if used (75% of statutory minimum wage)

Signatures

1. Student
2. Parent or Guardian
3. Employer
4. Teacher-Coordinator
5. School Administrator
6. Other

Training Plan

1. Schedule of special training sessions provided by employer and various tasks to be learned and performed on the job; approximate length of time to be allotted to each. Experiences should be planned in terms of the various dimensions of work, such as:

   (a) acts (job duties)
   (b) tools and equipment
   (c) materials, products
   (d) working environments
   (e) interpersonal relationships
   (f) attitudes and appreciations

2. Safety instruction both at school and on the job
3. Schedule of related vocational and related academic instruction to be provided in school; approximate length of time to be allotted to each unit
4. Plan of evaluation

Suggested Content of Training Agreements (continued)

Completion Certification

1. Overall evaluation to reflect acquired efficiency or level of performance achieved

2. Number of hours of (a) special training provided by employer
   (b) productive work on the job

3. Number of hours of (a) related instruction in school
   (b) safety instruction in school

Other (as required by State and/or local education agency)

Addendum*

Added Training Costs

1. Identification of cost factors
2. Justification of each
3. Amount of funds requested
4. Duration of reimbursement
5. Agreement features
6. Other

Student Costs

1. Identification of items or services to be purchased by employees in the occupation
2. Justification of each
3. Cost of each
4. Agreeement features
5. Other

Other (as determined by State and/or local educational agency)

* To be included when necessary and only for Part G program

Cooperative Vocational Education Programs

PERSONS SERVED

In keeping with the purpose of vocational education as stated in P.L. 90-576, cooperative vocational education should be made readily available to all persons whose needs, interests and abilities can be better met through alternation of school and work. In order to assure the effective participation of those for whom cooperative vocational education programs are being planned, the realities of the labor market, with respect to age, should be kept in mind.

Since very few employment opportunities are open to youth under 14, the minimum age for enrollment should be set at 14 or higher. Child labor laws influence program planning for the age group 14-15. Until recently, Federal Child Labor Regulation 3 did not permit 14- and 15-year old youth to be employed on school time, thereby inhibiting program development for this age group. As published in the November 5, 1969 Federal Register, the temporary revision of Regulation 3 permits school-time employment under experimental conditions established by the Department of Labor. The revision is intended to extend the advantages of school-supervised employment to disadvantaged youth. Many States have already applied for approval of their work related programs. Applications must be submitted by the State educational agency, generally through the office of the Chief State School Officer. Information about approval procedures may be obtained from the Bureau of Labor Standards, U.S. Department of Labor.

Persons 16 and older may enroll and enter upon legal employment in accordance with Federal and State labor laws. Placement in occupations declared hazardous by the Secretary of Labor is limited to those who are 18 or older.

Out-of-school youth and adults may be enrolled if their schedule of participation reflects a combination of school and work. Conceptually, cooperative training was developed to implement vocational curriculum objectives and to respond to the needs of persons enrolled for full-time study. It is anticipated, therefore, that the primary emphasis will be given to youth still in school and to youth returning to school after dropping out or graduating from high school.

Students in nonprofit private schools may be enrolled in Part B cooperative vocational education programs if State policies permit. In planning Part G programs, such students must receive consideration.

* * *

In general, any person may be enrolled in a Part G teacher education program if the objective of his participation is to function in a cooperative vocational education program. Instructional content in such programs must be germane to cooperative vocational education.

Civil Rights Compliance

Discrimination Prohibited - Title VI of the Civil Rights Act of 1964 states:

> "No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."

Therefore, any program or activity receiving financial assistance from the Department of Health, Education, and Welfare must be operated in compliance with this law.